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8 Attorney for Defendant Josef F. Boehm

9 IN THE UNITED STATES DISTRICT COURT

10 DISTRICT OF ALASKA

11
12 Sally C. Purser,)
13 Plaintiff,)
14 v.)
15 Josef F. Boehm, Allen K.)
Bolling, and Bambi Tyree,)
16 Defendants.)
17)
18)

19 CASE NO.: A05-0085 (JKS)

20 I Brett A. Greenfield, declare as follows:

21 1. I am an attorney duly licenced to practice law in the State of
22 California and before this Honorable Court.

23 2. The following true and correct copies of documents have been
24 marked and attached hereto as Exhibits to Defendant Boehm's Motion to
25 Compel Further Responses to Boehm's Second Set of Discovery:

1 2. On November 10, 2006, I caused to be served on Plaintiff Sally
2 Purser a Second Set of Discovery Requests a copy of which is attached
3 hereto as Exhibit A.

4 3. On December 13, 2006, the date on which responses were due,
5 Plaintiff filed inadequate responses attached hereto as Exhibit "B".

6 4. On January 22, 2007, I sent a meet and confer letter to Mr. Darryl
7 Jones which was not responded to, attached hereto as Exhibit "C".

8
9 5. The following is an itemization of the fees and expenses incurred
10 by the moving party in seeking this order to compel discovery:

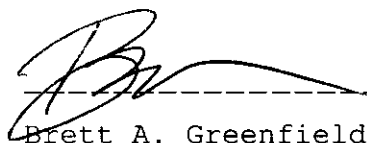
11 A. Attorney time expended doing research, drafting, and editing
12 notice of motion, motion, points and authorities and
13 declaration: 8 Hours @ \$350.00/hour = \$2,800.00; and

14 B. Paralegal time expended doing research: 10 hours @
15 \$150.00/hour = \$1,500.00.

16 C. Total Expenses: \$4,300.00

17 I declare under penalty of perjury that the foregoing is true and
18 correct.

19
20 DATED this 24TH day of January, 2007 at Encino, California.

21
22
23 
Brett A. Greenfield